DRIGINAL

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

AMERICAN BROADCASTING
COMPANIES, INC., DISNEY
ENTERPRISES, INC., TWENTIETH
CENTURY FOX FILM CORPORATION,
CBS BROADCASTING INC., CBS
STUDIOS INC., FOX TELEVISION
STATIONS, LLC, FOX BROADCASTING
COMPANY, LLC, NBCUNIVERSAL
MEDIA, LLC, UNIVERSAL TELEVISION
LLC, and OPEN 4 BUSINESS
PRODUCTIONS, LLC,

Plaintiffs and Counterclaim-Defendants,

V.

DAVID R. GOODFRIEND and SPORTS FANS COALITION NY, INC.,

Defendants and Counterclaim-Plaintiffs.

USDC SDNY	
DOCUMENT	
ELECTRONICALLY FILE	D
DOC #:	_
DATE FILED: 11/22/19	_]

Case No. 19-cv-7136-LLS

STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO RESPOND TO PLAINTIFFS/COUNTERCLAIM-DEFENDANTS' MOTION TO DISMISS

It is hereby stipulated and agreed by the attorneys for Plaintiffs/Counterclaim-Defendants American Broadcasting Companies, Inc., Disney Enterprises, Inc., Twentieth Century Fox Film Corporation, CBS Broadcasting Inc., CBS Studios Inc., Fox Television Stations, LLC, Fox Broadcasting Company, LLC, NBCUniversal Media, LLC, Universal Television LLC, and Open 4 Business Productions, LLC (collectively, "Plaintiffs/Counterclaim-Defendants") and Defendants/Counterclaim-Plaintiffs David R. Goodfriend and Sports Fans Coalition NY, Inc. (collectively, "Defendants/Counterclaim-Plaintiffs") that Defendants/Counterclaim-Plaintiffs be

granted a fourteen-day extension of time up to and including December 10, 2019, to file an opposition to the motion to dismiss filed by Plaintiffs/Counterclaim-Defendants on October 28, 2019 (Dkt. No. 37).

The current due date for the opposition is November 26, 2019. The request for an extension is made by Defendants/Counterclaim-Plaintiffs to give them sufficient time to respond to the arguments in Plaintiffs/Counterclaim-Defendants' motion to dismiss, in light of discussions between the parties concerning the case schedule that have been ongoing since the initial status conference before the Court on November 1, 2019. This is the second request for an extension of time. The court previously granted a fourteen-day extension of time on November 12, 2019, extending the original due date for the opposition from November 12, 2019 to November 26, 2019 (Dkt. No. 45).

The parties respectfully request that the Court enter the above Stipulation as the Order of the Court.

Dated: November 22, 2019

/s/ R. David Hosp

R. David Hosp

Elizabeth E. Brenckman

ORRICK, HERRINGTON & SUTCLIFFE LLP

51 West 52nd Street

New York, NY 10019

Tel: (617) 880-1886

(212) 506-3535

dhosp@orrick.com

ebrenckman@orrick.com

Mark S. Puzella (pro hac vice)

Sheryl Koval Garko (*pro hac vice*) 222 Berkeley Street, Suite 2000

Boston, MA 02116

Tel: (617) 880-1896

(617) 880-1919

mpuzella@orrick.com

sgarko@orrick.com

/s/ Gerson A. Zweifach

Gerson A. Zweifach

Thomas G. Hentoff (pro hac vice)

Joseph M. Terry (pro hac vice)

WILLIAMS & CONNOLLY LLP

725 Twelfth Street, N.W.

Washington, DC. 20005

Tel: (202) 434-5000

gzweifach@wc.com

thentoff@wc.com

jterry@wc.com

Paul D. Clement (pro hac vice)

Erin E. Murphy (pro hac vice)

KIRKLAND & ELLIS LLP

1301 Pennsylvania Avenue, NW

Washington, DC 20004

Tel: (202) 389-5000

paul.clement@kirkland.com
erin.murphy@kirkland.com

Attorneys for All Plaintiffs and Counterclaim Defendants

Alexander P. Okuliar (pro hac vice) 1152 15th Street, N.W. Washington, D.C. 2005-1706 Tel: (202) 339-8431 aokuliar@orrick.com

Attorneys for Defendants and Counterclaim-Plaintiffs David R. Goodfriend and Sports Fans Coalition NY, Inc.

SO ORDERED on this **22** day of November, 2019:

The Honorable Louis L. Stanton United States District Judge